

Daniel S. Szalkiewicz, Esq.
DANIEL SZALKIEWICZ & ASSOCIATES, P.C.
23 WEST 73RD STREET
SUITE 102
NEW YORK, NEW YORK 10023
Attorneys for Plaintiff Victor Voe

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

VICTOR VOE,

Plaintiff,

v.

JOHN DOES 1-9,

Defendants.

Case No. 20-cv-5737

DANIEL S. SZALKIEWICZ declares as follows:

1. I am a partner at the law firm of Daniel Szalkiewicz & Associates, P.C., attorneys for plaintiff Victor Voe (“Voe” or “Plaintiff”) in the above-captioned action. I submit this declaration in support of Plaintiff’s motion to amend the complaint and in opposition to the motion to dismiss filed by defendants Dylan and Wayne Yamamoto (the “Defendants” or “Yamamotos”).

2. I have personal knowledge of every statement made in this declaration based on my discussions with Plaintiff and review of the documents and files pertaining to this matter and affirm such statements are true and correct.

3. Annexed hereto as Exhibit 1 is a true and accurate copy of the Excel spreadsheets received from MG FREESITES LTD in response to Plaintiff’s subpoena.

4. Annexed hereto as Exhibit 2 is a true and accurate copy of an email received from Charter Communications concerning notice to Defendants.

5. Annexed hereto as Exhibit 3 is a true and accurate copy of the Charter Communications subpoena response.

6. Annexed hereto as Exhibit 4 is a true and accurate copy of the of the proof of service on MG FREESITES LTD.

7. Annexed hereto as Exhibit 5 is a true and accurate copy of the Redlined Proposed Second Amended Complaint.

8. Annexed hereto as Exhibit 6 is a true and accurate copy of the Proposed Second Amended Complaint.

Dated: October 28, 2024

/s/ Daniel Szalkiewicz
Daniel S. Szalkiewicz